

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
EASTERN DIVISION**

RODNEY D. PIERCE and  
MOSES MATTHEWS,

Plaintiffs,

v.

THE NORTH CAROLINA STATE BOARD  
OF ELECTIONS, *et al.*,

Defendants.

Case No. 4:23-cv-193-D

**PLAINTIFFS' NOTICE OF BRIEF OBJECTING TO LEGISLATIVE DEFENDANTS'  
MOTIONS TO ADMIT SUPPLEMENTAL OPINIONS OF DR. JOHN ALFORD**

Plaintiffs Rodney D. Pierce and Moses Matthews notify the Court of their opening brief setting forth objections to Legislative Defendants' motions to admit supplemental opinions of Dr. John Alford. On March 10, 2025, Legislative Defendants "move[d] the opening and rebuttal supplemental reports of Dr. John Alford, LD075 and LD076, for admission to the record as admitted exhibits." D.E. 122 at 1. On March 13, 2025, "Legislative Defendants move[d] Dr. Alford's Rule 26(e) Supplement, LD077, for admission to the record as an admitted exhibit." D.E. 123 at 1.

The March 10 joint filing noted that "Plaintiffs do not object to the admission of Dr. Alford's opening supplemental report, LD075," but that Plaintiffs do "object to the admission of certain portions of Dr. Alford's supplemental rebuttal report, LD076, as improper supplementation and improper rebuttal." D.E. 122 at 1. It further proposed that "Plaintiffs will file a brief setting forth their objections to LD076 within 14 days. Legislative Defendants will file any response to Plaintiffs' objections within 14 days, and Plaintiffs shall have 7 days to file any reply." D.E. 122 at 1-2. The March 13 filing noted further that "Plaintiffs object to the admission of LD077.

Plaintiffs' objection to LD077 will be briefed together with Plaintiffs' objection to portions of LD076 as set forth in the parties' Joint Notice of Filing Supplemental RPV Reports, D.E. 122." D.E. 123 at 1.

Plaintiffs' brief objecting to portions of LD076 and to all of LD077 is attached hereto as Attachment A. Exhibits to that brief, and a proposed order, are also attached.

Respectfully submitted this, the 24th day of March, 2025.

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**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing document with the Clerk of Court using the cm/ecf system, which will send notification of such filing to all counsel and parties registered in said system.

Respectfully submitted this, the 24th day of March, 2025.

/s/ Orion de Nevers  
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